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November 13, 2013

Honorable Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St., Courtroom 6E
Trenton, NJ 08608

Re: U.S. v. Commander et al.
Case No. 3:13-cv-01092

Dear Judge Bongiovanni,

I represent Kenneth Skerianz, one of the co-defendants in this case. On my client's behalf, in conjunction with counsel for the other parties in this case, I respectfully request an additional stay of the proceedings for an additional sixty days, or until February 1, 2014. Ann E. Nash, of the U.S. Dept. of Justice, counsel for the Plaintiff United States of America, and Avram Frisch, counsel for the other co-defendant, Darren Commander, have both consented to this requested stay.

The parties in this case have been participating in ongoing mediation to prospectively settle all issues involved in this case. The mediation is being conducted by the Honorable Elizabeth S. Stong, U.S. Bankruptcy Court (E.D.N.Y.) in the case captioned as Darren Commander v. Kenneth Skerianz, Adv. Proc. # 12-1080-CEC (Main Case # 11-50182-CEC), U.S. Bankruptcy Court, E.D.N.Y. The parties and their counsel have been cooperating with the mediation. The U.S. has requested information but all parties have agreed to keep confidential disclosures to the U.S. of such requested information. Staying the case for an additional 60 days should give the parties ample opportunity to negotiate settlement while conserving resources. A proposed Order is attached.

Please call my office if Your Honor requests additional information or would like to discuss this matter further with counsel. Thank you very much for Your Honor's consideration of this matter.

Respectfully,

s/ Darren M. Baldo

Encl.

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